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11 Attorneys for Defendant

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 DAVID MORALES-SANDOVAL,)
15 Plaintiff,) Case No.: 2:22-cv-00934-BNW
16 vs.) **UNOPPOSED MOTION FOR EXTENSION OF**
17 KILOLO KIJAKAZI,) **TIME TO FILE CERTIFIED**
18 Acting Commissioner of Social Security,) **ADMINISTRATIVE RECORD AND ANSWER**
19 Defendant.) **(FIRST REQUEST)**

1 Defendant Kilolo Kijakazi, Acting Commissioner of Social Security, by and through her
2 undersigned attorneys, hereby moves for a 30-day extension of time to file the Certified Administrative
3 Record (“CAR”) and answer to Plaintiff’s Complaint. The CAR and answer to Plaintiff’s Complaint are
4 due to be filed by September 26, 2022. This is the Commissioner’s first request for an extension of time.

5 Good cause exists for this extension because Defendant’s counsel is in the process of conferring
6 with his client to determine whether this matter can be resolved by settlement. The additional requested
7 time will allow for those discussions to occur and for potential settlement discussions with Plaintiff.
8 Additionally, Defendant’s counsel notes that he will be out of the country from September 29, 2022
9 through October 17, 2022. Accordingly, Defendant requests an extension in which to respond to the
10 Complaint until October 26, 2022.

11 On September 20, 2022, the undersigned conferred with Plaintiff’s counsel, Marc Kalagian, who
12 has no objection to the requested extension.

13 It is therefore respectfully requested that Defendant be granted an extension of time to file the
14 CAR and answer to Plaintiff’s Complaint, through and including October 26, 2022.

16 Dated: September 20, 2022

JASON M. FRIERSON
United States Attorney

18 _____
19 /s/ *Christopher Vieira* _____
20 CHRISTOPHER D. VIEIRA
21 Special Assistant United States Attorney
22 Attorneys for Defendant

23 **ORDER**
24 **IT IS SO ORDERED**

25 **DATED:** 5:36 pm, September 22, 2022

26 

BRENDA WEKSLER
UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of:

UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE
CERTIFIED ADMINISTRATIVE RECORD AND ANSWER

on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Gerald Morris Welt
gmwesq@weltlaw.com

Marc V. Kalagian
marc.kalagian@rksslaw.com

Attorneys for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 20, 2022.

/s/ Christopher Vieira
CHRISTOPHER D. VIEIRA
Special Assistant United States Attorney